

**DOAR RIECK KALEY & MACK**

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)  
WALTER MACK

OF COUNSEL  
JOHN JACOB RIECK, JR.  
JOHN F. KALEY  
e-mail: firm@doarlaw.com  
website: www.doarlaw.com

ASTOR BUILDING  
7TH FLOOR  
217 BROADWAY  
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730  
FACSIMILE: (212) 962-5037

May 23, 2025

**By ECF Filing**

Hon Analisa Torres  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Guo, et al.*  
Docket No. S3 23 Cr. 118 (AT)

Dear Judge Torres:

Counsel for the defendant Miles Guo respectfully submit this further joint status letter regarding the issue of forfeiture as the Court directed in an Order dated May 9, 2025.

With respect to forfeiture and whether Mr. Guo is claiming a personal interest in any of the property potentially subject to forfeiture, the Government and Mr. Guo's newly-appointed counsel have conferred and, following a request from the defense, the Government has identified for counsel certain information and trial evidence to aid the defense in assessing this issue. The matter, however, is more complicated than initially anticipated given, *inter alia*, the arguments of the Government at trial, the mixed verdict of the jury and the activities of the Trustee in the Bankruptcy case, who has obtained adjudications in a number of proceedings to the effect that Mr. Guo was the owner or beneficial owner of particular property. As such, counsel needs additional time to do further due diligence and to discuss this matter further with Mr. Guo to arrive at an appropriate factual and legal position.

The parties propose that the Court permit them to provide a further joint status letter to the Court by June 13, 2025.

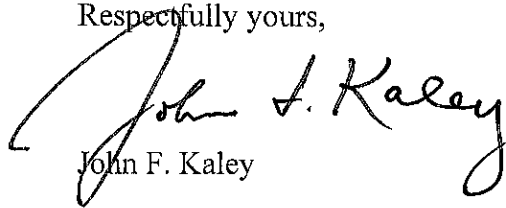
Honorable Analisa Torres

2

May 23, 2025

The parties are available to address any questions the Court may have.

Respectfully yours,

A handwritten signature in black ink, appearing to read "John F. Kaley". The signature is fluid and cursive, with a large initial "J" and "K".

John F. Kaley

cc: All counsel by ECF Filing